

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

THOR HALVORSSSEN,)	
)	
Plaintiff,)	
)	Case No. CV 18-2683-JMA-AYS
v.)	
)	
GLENN SIMPSON, PETER FRITSCH,)	
FRANCISCO D'AGOSTINO-CASADO,)	
LEOPOLDO BETANCOURT-LOPEZ, PEDRO)	
JOSE TREBBAU-LOPEZ, FRANCISCO)	
CONVIT-GURUCEAGA,)	
)	
Defendants.)	

DECLARATION OF JOSHUA A. LEVY

Joshua A. Levy declares as follows:

1. I am a member of the New York Bar, have been admitted *pro hac vice* to appear as counsel for Defendants Glenn Simpson and Peter Fritsch in the above-captioned matter. On their behalf, I submit this declaration and exhibits attached hereto in support of the Memorandum of Law in Support of Defendants Glenn Simpson's and Peter Fritsch's Motion to Dismiss.

2. Attached hereto as **Exhibit 1** is a true and correct copy of Order Denying Motion to Amend: *Halvorssen-Mendoza v. Betancourt Lopez, et al.*, No. 13-036379 (Fla. 11th Cir. Ct. Jun. 27, 2016).

3. Attached hereto as **Exhibit 2** is a true and correct copy of José de Córdoba, *Suit Alleges Graft in Venezuelan Contracts*, WALL ST. J., Jul. 31, 2013.

4. Attached hereto as **Exhibit 3** is a true and correct copy of José de Córdoba & Christopher M. Matthews, *Venezuelan Energy Company Investigated in U.S.*, WALL ST. J., Aug. 8, 2014

5. Attached hereto as **Exhibit 4** is a true and correct copy of Plaintiff's Motion for Leave to File Second Amended Complaint: *Halvorssen-Mendoza v. Betancourt-Lopez, et al.*, No. 13-036379 (Fla. 11th Cir. Ct. Apr. 4, 2016).

6. Attached hereto as **Exhibit 5** is a true and correct copy of Halvorssen Aff., *Halvorssen-Mendoza v. Betancourt-Lopez, et al.*, No. 13-036379 (Fla. 11th Cir. Ct. Jun. 15, 2015).

I declare under penalty of perjury that the foregoing is true and correct.
Executed in Washington, D.C. on December 19, 2018.

/s/ Joshua A. Levy